

FILED

September 04, 2024

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
EL PASO DIVISION**

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS
By: DT
Deputy

UNITED STATES OF AMERICA,

Plaintiff,

v.

VARU GILBERTO VILLALOBOS,

Defendant.

Case No: EP:24-CR-01990-LS**INDICTMENT****§ CT 1: 18 U.S.C. §1621 – Perjury;**

**§ CT 2: 42 U.S.C. §408(a)(7)(B) – False
§ Representation of Social Security
§ Number;**

**§ CT 3: 18 U.S.C. §1546(b)(3) – Use of
§ False Statement in Immigration Matter;**

**§ CT 4: 18 U.S.C. §1546(b)(1) – Use of
§ Identification Document Not Lawfully
§ Issued;**

**§ CT 5: 18 U.S.C. §1546(b)(2) – Use of
§ False Identification Document.**

THE GRAND JURY CHARGES:

COUNT ONE

Perjury

On or about April 24, 2023, in the Western District of Texas, Defendant

VARU GILBERTO VILLALOBOS

did willfully and knowingly subscribe as true a material matter, his citizenship, which he did not believe to be true, in a statement under penalty of perjury as permitted under Title 28, United States Code, Section 1746, to wit: an I-9 Form submitted to “Company A”.

COUNT TWO

False Representation of Social Security Number

On or about April 24, 2023, in the Western District of Texas, Defendatn

VARU GILBERTO VILLALOBOS

for the purpose of obtaining for himself and any other person anything of value from any person, and for any other purpose, did, with intent to deceive, falsely represent a number to be the social security account number assigned by the Commissioner of Social Security to him in an I-9 form submitted to “Company A”, when in fact, such number was not the social security account number assigned by the Commissioner of Social Security to him, in violation of Title 42, United States Code, Section 408(a)(7)(B).

COUNT THREE

Use of False Statement in Immigration Matter

On or about April 24, 2023, in the Western District of Texas, Defendant

VARU GILBERTO VILLALOBOS

for the purpose of satisfying a requirement of the employment verification system set forth in subsection 1324(b) of Title 8 of the United State Code, used a false attestation on an I-9 Form submitted to “Company A”, knowing that the said attestation was false in that he was not a United States citizen, in violation of Title 18, United States Code, §1546(b)(3).

COUNT FOUR

Use of Immigration Identification Document Not Lawfully Issued

On or about April 24, 2023, in the Western District of Texas, Defendant

VARU GILBERTO VILLALOBOS

for the purpose of satisfying a requirement of the employment verification system set forth in subsection 1324a(b) of Title 8 of the United State Code, used an identification document, to wit, a Social Security Card, knowing or having reason to know that said document was not issued lawfully for the use of the Defendant who possessed said document, in violation of Title 18, United States Code, §1546(b)(1).

COUNT FIVE

Use of a False Identification Document

On or about April 24, 2023, in the Western District of Texas, Defendant

VARU GILBERTO VILLALOBOS

for the purpose of satisfying a requirement of the employment verification system set forth in subsection 1324a(b) of Title 8 of the United State Code, used a false identification document, to wit, a Texas Identification card, knowing or having reason to know that the document was false in that it depicts a person using the name of someone else, in violation of Title 18, United States Code. §1546(b)(2).

A TRUE BILL

FOREPERSON OF THE GRAND JURY

JAIME ESPARZA
UNITED STATES ATTORNEY

BY: _____

Yori C. Hughes
Assistant U.S. Attorney